

Aalto University

Privacy Notice for Aalto Summer Students

General Data Protection Regulation (EU) 2016/679, (GDPR), Articles 13 and 14

Dear Aalto Summer Students,

This notice concerns Aalto Summer continuing education students who have a right to pursue single course(s). The notice contains information about how personal data on students is processed and the rights that students have to their own personal data.

In order to comply with our tasks, such as arranging teaching, collecting and maintaining data on studies, and providing student services, we have to process various kinds of information by which an individual may be identified, that is 'personal data'. In this context, the student is referred to as a 'data subject' and we are referred to as the 'controller', that is, the party that controls the processing of the personal data for the abovementioned purposes. We only process personal data that is necessary for complying with our tasks. Therefore, we collect and handle personal data in accordance with the particular needs of student groups.

Name of register:	Aalto Summer continuing education
Date:	3 July 2018
Controller, unit in charge:	Aalto University Aalto University Foundation Postal address: P.O. Box 11000, FI-00076 AALTO Street address: Otakaari 24, 02150 Espoo Tel.: +358(9) 47001 (exchange) Learning Services Eija Zitting, Head of Learning Services
Person in charge, contact person and contact details	Person in charge: Ms Johanna Söderholm, Chief, Programme Management Services Contact person: Ms Mervi Rantanen, Aalto Summer Project Manager, Learning Services, Contact details: summer@aalto.fi
University's data protection officer, contact details	Mr Jari Söderström, Senior Legal Counsel, Aalto University Postal address: P.O. Box 11000, FI-00076 AALTO Street address: Otakaari 24, 02150 Espoo Tel: +358 (9) 47001 (exchange) Email: dpo@aalto.fi You may contact the Aalto University's data protection officer for questions concerning the university's data protection policies, this present notice or other matters concerning the processing of personal data by the university.

Purpose and legal grounds for the processing of personal data	<p>Personal data is processed for the organization of Aalto Summer courses. Personal data is processed also for statistical purposes.</p> <p>The university's right to process personal data as a controller is mainly based on the following:</p> <p><u>Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract:</u> processing applications, admission to courses, arranging teaching, registration of credits, collecting feed-back and taking care of invoicing.</p> <p><u>Compliance with a legal obligation to which the controller is subject:</u> Some of the course credits may have to be reported to National Data Warehouse for Higher Education (VIRTA).</p> <p>The university has a right as controller to process special categories of personal data when the processing is necessary for reasons of substantial public interest or is based on an explicit consent (Article 9(2), point a or g).</p>
A: Personal data collected directly from the data subject	<p>Yes</p>
B: Personal data collected elsewhere than from the data subject	<p>Yes</p> <p>Source of personal data: Aalto University staff and IT-systems</p> <ul style="list-style-type: none"> - Data regarding admission for courses and programmes - Data regarding study assessment and attainment for courses and programmes - Aalto ID and username
Categories of personal data in the register	<p>Aalto Summer processes categories of personal data concerning students outside Aalto University who are applying and participating Aalto Summer courses</p> <p>Individualising information:</p> <ul style="list-style-type: none"> • Name • Date of birth • Nationality • Contact details: Postal address, e-mail address, telephone number (Skype ID) • Passport information <p>Information regarding student's application:</p> <ul style="list-style-type: none"> • Contact person • Home university • Position at home university • Educational background • Work experience • Curriculum Vitae (CV) • English language skills • Name of embassy • Invoicing information

	<ul style="list-style-type: none"> • Letter of motivation • Special needs • Accommodation requirements <p>Information regarding completed studies:</p> <ul style="list-style-type: none"> • Completed courses and programmes with marking <p>Additional:</p> <ul style="list-style-type: none"> • Aalto ID and username <p>Student study information that may contain special categories of personal data (sensitive data): Information given by the data subject relating to special needs</p>
<p>The recipients or categories of recipients of the personal data</p>	<p>At Aalto University, the data is processed only by Aalto employees or contracted individuals working on behalf of Aalto who need the data for their work duties. The information is protected from unauthorised handling. Access rights are in place to restrict unauthorised access to the student information systems. The personal data is processed mainly by Learning Services staff and teaching staff. In addition, personal data may be processed by Aalto's campus- and security services, Learning Centre services, IT services, and financial services.</p> <p>Aalto University may disclose personal data on students as follows:</p> <ul style="list-style-type: none"> • for scientific research • to comply with the Act on the Openness of Government Activities (621/1999) or with other legal obligations • with the student's consent, contact information may be disclosed to parties outside the university for marketing communications or other special purposes <p>Continuing education data is transferred to Virta, the National Data Warehouse for Higher Education.</p>

<p>Planned transfers of personal data to third countries or international organisations</p>	<p>The controller does not, as a rule, transfer information from this register outside the European Union (EU) or European Economic Area (EEA).</p> <p>The data protection policy of the university is to exercise particular care when transferring personal data outside the EU and the EEA to countries that do not offer the data protection required by the European General Data Protection Regulation (GDPR). Transfers of personal data outside the EU and EEA are done in accordance with the requirements of the GDPR.</p>
<p>Criteria used to determine the period for which data are stored and periods for which personal data are stored</p>	<p>The periods for which personal data saved in systems and manual material are stored, are based on the law and the records management plan of Aalto University.</p> <p><u>Applications:</u> rejected 2 years; accepted 6 years</p> <p><u>Information on education:</u> study attainments and their grades: minimum of 50 years</p> <p><u>Information on accounting:</u> accounting information must be kept for a minimum of 6 years from the end of each accounting period.</p>

Rights of the data subject

To make any information requests related to his or her rights as a data subject, the student may send an e-mail to: summer@aalto.fi

Right of students to access their data

Students have a right to know what personal data are being processed and what data concerning them have been saved.

- The student may make an information request to the university. In such cases, the following procedure is to be followed:
- The university provides the information requested without undue delay. The person making the request must verify his/her identity as necessary. The requested information or the additional information related to the request must be provided no later than one month after receiving the request. If the information request is complex and comprehensive, the deadline may be extended by two months.
- As a rule, the information shall be provided free of charge. For any further copies requested by the student, the university may charge a fee based on administrative costs. Where requests are manifestly unfounded or excessive, in particular because of their repetitive character, the university may either charge a fee based on administrative costs or refuse to act on the request. The university shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request.
- If the university does not provide the information requested, the student will be provided with a written account of the matter. The written account will also include an explanation of the student's rights to judicial remedies, for instance, the right to lodge a complaint with the supervisory authority.

Right of the student to rectification of data

- The student has a right to have any inaccurate or incomplete personal data concerning him or her rectified or completed without undue delay. In addition, the student has a right to demand that all personal data concerning him or her that is no longer necessary be erased.
- If the university does not accept the student's request for rectifying his or her personal data, the student will be given a written account specifying the reasons for rejecting his or her request. The written account will also include an explanation of the student's rights to judicial remedies, for instance, the possibility of lodging a complaint with the supervisory authority.

Student right to erasure of data

- Depending on the legal basis, the student may have a right to have their personal data erased from the register of the school. This right shall not apply to cases where data processing is necessary for compliance with a legal obligation or for a task carried out in the exercise of official authority vested in the school. The storage and erasure of data shall comply with the records management plans of the university and the data storage periods required by legislation.

Right to restrict processing

- In certain situations, students may have the right to restrict the processing of their personal data until the legal basis for the data or their processing has been duly checked and rectified or completed.
- This right shall not apply to cases where data processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. As a result, this right shall not apply, as a general rule, to the personal data files of the university.

Right to data portability

- The right to data portability means that the data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the university, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the university. This right shall apply only to situations where the processing is carried out by automated means and is based on consent or on a contract.

Right to object to processing of personal data

- The student shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on the performance of a task carried out in the public interest or in the exercise of official authority or the legitimate interest of the university. In such cases, the university shall no longer process the personal data unless the university demonstrates compelling legitimate grounds for the processing.

The right of the data subject to withdraw consent

- In situations where the processing of the personal data is based solely on consent, the student shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
- As a rule, the withdrawal of consent is communicated to the party to which the original consent was given. If this is impossible, the student may e-mail to: dpo@aalto.fi

The right of the data subject to lodge a complaint with a supervisory authority

- The student shall have the right to lodge a complaint with a supervisory authority, if they consider that the processing of personal data relating to him or her infringes the General Data Protection Regulation (EU) 2016/679. In addition, the student has a right to use other administrative or judicial remedies.
- The student shall have the right to bring proceedings against the controller or the organisation processing the personal data before

	a court if the student considers that the processing of his or her personal data infringes the General Data Protection Regulation.
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